

**REMARKS**

Claims 1-17 and 19-20 are pending in this application. By this Amendment, claim 18 is canceled without prejudice or disclaimer and claims 10 and 19 are amended.

Entry of this Amendment is proper under 37 C.F.R. §1.116 since the amendments: (1) place the application in condition for allowance for the reasons set forth below; (2) do not raise any new issues requiring further search and/or consideration, since the amendments amplify issues previously discussed throughout prosecution without incorporating additional subject matter; and/or (3) place the application in better form for appeal should an appeal be necessary. More specifically, subject matter from previous claims 18 and 19 has been incorporated into independent claims 10 and 19. Entry is proper under 37 C.F.R. §1.116.

The Office Action rejects claims 1-20 under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement. In particular, the December 5, 2003 Office Action indicates that the specification does not enable one skilled in the art to apply the scan pulse to electrodes in two different directions. Applicants respectfully submit that the present claims are directed toward a method of driving a PDP. As such, the claims are directed toward different ways in which pluses may be applied. It is respectfully submitted that one skilled in the art from reading the present specification would be enabled to practice the claimed features based on the specification. For example, one skilled in the art would have known that scan pulses may be applied by address driver integrated circuit chips. More specifically, paragraph [06] of the present specification discloses that driving ICs may be used. This paragraph was referenced in

the February 9, 2004 telephonic interview summary. Additionally, U.S. Patent 6,473,061 to Lim et al. (which is cited in the Office Action and is assigned to the same Assignee as this application) discloses that IC chips may be connected to address electrode lines. The address driver IC chips may be driven by drivers. See column 12, lines 35-45. As such, one skilled in the art would be enabled to apply the claimed scan pulses. The claims relate to a methodology that may be incorporated within software of the apparatus, as would be well known to one skilled in the art. The methodology within the PDP may apply the signals using drivers coupled to address electrode lines, for example. The structure to perform this feature would be well known to one skill in the art as indicated above. The methodology of applying the claimed features would be known to one skilled in the art from reading the specification, as the specification clearly sets forth the respectively claimed features. One skilled in the art therefore would have been enabled to make and use the respective claimed features from reading the specification. As such, the specification enables one skilled in the art to practice the claimed features. Withdrawal of the rejection under 35 U.S.C. §112, first paragraph, is respectfully requested.

Claims 1-9 have not been rejected based on prior art. Therefore, it is respectfully submitted that claims 1-9 define patentable subject matter.

The Office Action rejects claims 10, 11, and 14-17 under 35 U.S.C. §102(e) by U.S. Patent 6,531,994 to Nagano. The Office Action also rejects claim 12 under 35 U.S.C. §103(a) over Nagano in view of the Journal of Applied Physics article to Ikeda et al (hereafter the Ikeda article). The Office Action also rejects claim 13 under 35 U.S.C. §103(a) over Nagano in view of

U.S. Patent 6,473,061 to Lim et al. Still further, the Office Action rejects claims 18 and 19 under 35 U.S.C. §103(a) over Nagano in view of U.S. Publication 2001/0026254A1 to Ide et al. (hereafter Ide). The Office Action further rejects claim 20 under 35 U.S.C. §103(a) over Nagano in view of U.S. Patent 6,587,084 to Alymov et al. (hereafter Alymov). The rejections are respectfully traversed with respect to the pending claims.

Claim 10 has been rewritten to include the features previously recited in dependent claim 18. Thus, applicant will address the rejection set forth in the Office Action regarding claim 18. The Office Action indicates that Nagano does not disclose that the first scan pulse is applied to scan electrodes from 1 to  $N/2$  and from  $N/2$  to  $N$  and the second scan pulse is applied from  $N/2$  to 1 and from  $N$  to  $N/2$ . The Office Action then relies on Ide as disclosing two driver circuits that each control  $n/2$  outputs from the scan driver circuit 602 to the scan electrode 601-1 to 601- $n$ . See Ide's paragraph [009]. The Office Action then asserts that it would have been obvious to combine Nagano (in which scan pulses are allegedly applied from 1 to  $N$  or from  $N$  to 1) and Ide (in which the scan pulses are allegedly applied to a group of  $n/2$  scan electrodes) in order to find the features of previous dependent claim 18.

Applicants respectfully submit that the combination of Nagano and Ide is improper. That is, there is no suggestion in the prior art for combining these two types of features. Rather, the only motivation is from applicant's own specification. The Office Action asserts that the motivation to combine these features would be since both references relate to methods of driving a plasma display panel and further that both references relate to methods of driving scan

electrodes 1 to N. This is not proper motivation to make such modifications of the primary reference. The present specification discloses a unique combination of features that is not known in the prior art. Merely because one reference discloses one driving method and another reference disclose a separate method, there is no motivation that these may be combined absent some suggestion of motivation in the prior art. The Office Action does not provide proper motivation for this combination. As such, the combination is improper.

Previous dependent claim 19 has been rewritten in independent form to include features of claims 10 and 19. For similar reasons as discussed above with respect to claim 10, applicant respectfully submits that Nagano and Ide may not be combined as suggested in the Office Action to reach the features of dependent claim 19.

Further, with respect to claims 10 and 19, the section of Ide relied upon in the Office Action merely asserts that each of the scan driver circuits 609a and 609b controls a certain number of outputs from the scan driver circuit 602. There is no suggestion in this section for any order of pulses. There is no suggestion of how this may be combined with Nagano's driving technique. Further, there is no suggestion of how this may be combined with Nagano in order to apply scan pulses in ascending number order and in descending number order. Claims 10 and 19 relate to specific number orders that were not recognized by Nagano and Ide (even if they are combined). It is respectfully submitted that the Office Action fails to provide proper motivation to make this combination and relies on applicant's own specification to make the combination. This is impermissible hindsight. As such, the Office Action fails to make a *prima facie* case of

obviousness. Independent claims 10 and 19 therefore define patentable subject matter.

Claims 11-17 and 20 depend from claim 10 and therefore define patentable subject matter at least for this reason.

The Office Action further relies on Lim to reject claim 13. Lim is commonly assigned to the Assignee of the present application. It appears that Lim is being relied upon as a reference under 35 U.S.C. §103(a) by way of 35 U.S.C. §102(e). Therefore, in accordance with 35 U.S.C. §103(c), Lim may not be used as a prior art reference against the present application since Lim and the present application were commonly assigned at the time the invention was made. See MPEP §2146. Applicant respectfully submits that claim 13 is therefore allowable, as the other applied references do not teach or suggest all the features of claim 13.

For at least the reasons set forth above, each of claims 1-17, 19 and 20 define patentable subject matter. Withdrawal of the outstanding rejections is respectfully requested.

### CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-17, 19 and 20 is earnestly solicited.

If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, David C. Oren, at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is

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hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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